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\*ADMITTED IN DC ONLY

June 3, 2014

VIA ECFS

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: WC Docket No. 12-375 - Global Tel\*Link Corporation - Notice of Ex Parte  
Presentation

Dear Secretary Dortch:

On June 3, 2014, , David Silverman, Senior Vice President and General Counsel for Global Tel\*Link Corporation ("GTL") and the undersigned, met with Lynne Engledow, Kalpak Gude, David Zesiger, and Danielle Thumann (Intern) of the Wireline Competition Bureau, Pricing and Policy Division, to discuss matters relating to inmate calling services ("ICS") addressed by the Federal Communications Commission's ("FCC's") Report and Order and Further Notice of Proposed Rulemaking ("*Order and FNPRM*").<sup>1</sup>

The primary purpose of GTL's meeting was to update FCC Staff regarding GTL's meetings with Commissioner Clyburn, and representatives in the offices of Chairman Wheeler, and Commissioners O'Rielly and Pai held on May 29<sup>th</sup>. GTL reiterated its willingness to work with FCC Staff to produce a regulatory solution that recognizes the rights and interests of all affected. The discussion covered:

<sup>1</sup> Report and Order & Further Notice of Proposed Rulemaking, *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 14107 (2013) ("*Order and FNPRM*").

Marlene H. Dortch  
Secretary  
June 3, 2014

- Jurisdictional issues concerning intrastate ICS rates and the payment of site commissions under Sections 201(b) and 276 of the Communications Act of 1934, as amended. 47 U.S.C. §§ 201(b) and 276.
- How the correctional facility request for proposal process dictates what services will be provided to those customers and the pricing rather than the number of beds or length of stays.
- Competitive market forces are the most effective and efficient means for achieving just and reasonable rates.
- Why pricing tiers defined by regulation will not be able to capture the widely varying needs of the correctional facility customer.
- The need for a transition period to address existing contracts and the suggestion that look-back requirements could be used to ensure the goals of any comprehensive solution are achieved.
- The regulatory uncertainty and competitive distortions created by the *Order and FNPRM* regarding the lawfulness of the continued payment of site commissions on interstate ICS calls. GTL referred to the May 23, 2014 and May 15, 2014, ex parte presentations in WC Docket No. 12-375 of Century Link and Securus Technologies, Inc., respectively, and the *Pay Tel Waiver Order, Rates for Interstate Inmate Calling Services*, DA 14-187, 29 FCC Rcd 1302, ¶¶ 9, 14, 17-18 (Feb. 11, 2014).
- The application of ancillary fees in the ICS marketplace generally, and GTL's prior positions on the use of such fees as set forth in its Comments in response to the NPRM and FNPRM in this docket. *See* Comments of Global Tel\*Link Corporation, WC Docket No. 12-375, filed December 20, 2013; Comments of Global Tel\*Link, WC Docket No. 12-375, DA 13-1445, filed July 17, 2013.
- The recently approved one-time data collection adopted by the *Order and FNPRM*.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this notice is being filed in the appropriate docket.

Marlene H. Dortch  
Secretary  
June 3, 2014

Please contact me if you have any questions regarding this matter.

Respectfully submitted,

*/s/ Chérie R. Kiser*

Chérie R. Kiser

Counsel for Global Tel\*Link Corporation

cc (via e-mail): Lynne Engledow  
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